

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Ben MOORLET

Case No. Case: 2:25-mj-30021
Assigned To : Unassigned
Assign. Date : 1/28/2025
Description: CMP USA V.
MOORLET (DJ)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 10, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: January 28, 2025

City and state: Detroit, Michigan



Complainant's signature

Jaclyn Kocis-Maniaci, Task Force Officer (ATF)

Printed name and title



Judge's signature

Hon. Kimberly G. Altman, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Jaclyn Kocis-Maniaci, being duly sworn, depose and state the following:

INTRODUCTION

1. I am a Task Force Officer (TFO) with the Detroit Police Department and Bureau of Alcohol, Tobacco, and Firearms (ATF). I have been employed with the Detroit Police Department for more than 21 years and have been a TFO since 2017. I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7), empowered by law to conduct investigations and make arrests of offenses enumerated under federal law.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

3. The ATF is currently conducting a criminal investigation concerning Ben Dandre MOORLET, for violating 18 U.S.C. § 922(g)(1) Felon in Possession of a Firearm.

PROBABLE CAUSE

4. On December 10, 2024, the Warren Police Department was conducting an investigation on an armed robbery that had occurred three days earlier. During their investigation, officers identified MOORLET as a suspect.

5. Warren PD set up surveillance at a house on Martin Luther King Blvd in Detroit, Michigan, in the Eastern District of Michigan, Southern Division. Officers saw MOORLET leave the house wearing clothing that matched a description given by the victim of the robber's clothing. MOORLET then got into the back of a blue Ford Taurus.

6. Officers conducted a traffic stop of the Taurus. MOORLET was then arrested for armed robbery.

7. MOORLET told officers he had a gun in the car, explaining that it was in "my coat." Evidence technicians responded to the scene and recovered a Sarsilmaz, Model Sar 9, 9mm caliber handgun with an extended magazine.

8. I reviewed records related to MOORLET's criminal history and learned that on July 18, 2011, MOORLET pled guilty to felony Home Invasion, first degree. And on December 12, 2017, MOORLET pled guilty to felony assault with a dangerous weapon (felonious assault) and carrying a weapon during a felony (felony-firearm).

9. MOORLET was sentenced to 2 to 4 years with the Michigan Department of Corrections for the 2017 felonious assault along with two years for the felony-firearm, to be served consecutively. Thus, MOORLET would have been aware that he was convicted of a crime punishable by more than a year in prison.

10. I contacted ATF Interstate Nexus Expert, Special Agent Kara Klupacs and provided a verbal description of the Sarsilmaz handgun recovered by Warren Police. SA Kara Klupacs explained that the firearm was manufactured outside of the state of Michigan, and therefore has traveled in and affected interstate commerce.

CONCLUSION

11. Based upon this information, there is probable cause to believe Ben MOORLET, a convicted felon, aware of his felony convictions, did knowingly and intentionally possess a Sarsilmaz, model Sar 9 handgun, said firearm having affected interstate commerce, in violation of 18 U.S.C. 922 (g)(1) (Felon in Possession of a Firearm).

Respectfully submitted,



Jaclyn Kocis-Maniaci, Task Force Officer
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me and signed in my presence
And/or by reliable electronic means



Honorable Kimberly G. Altman
United States Magistrate Judge

Dated: January 28, 2025